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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCUMENT CONTROL

Arizona Corporation Commission

DOCKETED

FEB 29 2000

DOCKETED BY

IN THE MATTER OF US WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH § 271 OF THE) **DOCKET NO. T-00000B-97-238**
TELECOMMUNICATIONS ACT)
OF 1996)
_____)

**MCI WORLDCOM'S COMMENTS ON THE
ARIZONA MASTER TEST PLAN**

MCI WorldCom, Inc., on behalf of its regulated subsidiaries (collectively "MCIW") respectfully submits the following comments regarding the Arizona Master Test Plan, draft version 3.1 (AZ MTP3.1) as provided by Cap Gemini Telecommunications ("CGT").

Generic Comment to the AZ MTP, draft version 3.1

General Concern:

CGT Comment: "The Master Test Plan is a map for how the Arizona tests will be conducted. The Test Administrator made changes as appropriate to the MTP making it consistent with the 271 Test Standards Document".

MCIW Comment: Throughout the document, in addressing MCIW's previous comments, Cap Gemini (CGT) consistently refers the reader to the TSD (Test Standards Document). However, an updated version that would incorporate these comments is not attached, and is, in fact, in the process of being updated. Cap Gemini's projected timeline for completion of the updated version of the TSD is 3/10/00. Therefore, MCIW believes final comments or approval of the Master Test Plan cannot be completed until BOTH documents have been considered.

Per MCIW's previous comments, it is very difficult to assess and manage two separate documents, namely the MTP 3.1 and the Test Standards Document. To have to cross-reference the two documents in order to evaluate and validate content is quite cumbersome and only increases the likelihood of inaccuracies.

Integrated Pre-Order and Order Functionality:

Functional testing of integrated pre-order and order must be added to the test. That is, the information obtained from the pre-order system is automatically populated, with no additional manipulation, onto the LSR in near real time. FCC orders have required proof of access to this functionality, which is imperative for full-scale commercial operation by competing local service providers.

MCIW Comment: No explanation from CGT. Language not yet included. The FCC stated the following regarding integration of pre-order and order functionality (CC Docket No. 99-295, section 137): "The Commission has explained previously that a BOC with integrated pre-ordering and ordering functions must

provide competing carriers with access to the same capability.¹ In this regard, the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require "parsing" pre-ordering information into identifiable fields.² Without an integrated system, a competing carrier would be forced to re-enter pre-ordering information manually into an ordering interface, which leads to additional costs and delays, as well as a greater risk of error.³ This lack of integration would place competitors at a competitive disadvantage and significantly impact a carrier's ability to serve its customers in a timely and efficient manner."⁴

Regression Testing:

Additional language must be added that specifically refers to what MCIW calls "regression" testing. That is, the third party should retest any fixes that are

¹ See *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20661-67; *First BellSouth Louisiana Order*, 13 FCC Rcd at 6275-79; *BellSouth South Carolina Order*, 13 FCC Rcd at 602, 620-29.

² See *BellSouth South Carolina Order*, 13 FCC Rcd at 620.

³ See *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20661, 20666, 20676-77; *First BellSouth Louisiana Order*, 13 FCC Rcd at 6276-77; *BellSouth South Carolina Order*, 13 FCC Rcd at 602, 623-24, 629 (finding that, in addition to increased costs and delays, manual retyping of information can contribute to a high error rate); see also AT&T Comments at 26; AT&T Crafton/Connolly Aff. at paras. 70, 73, 81 (noting that, absent integration, a carrier would incur substantial costs, delays, and risks of error by entering data twice – once into Bell Atlantic's OSS and again into the carrier's own systems); MCI WorldCom Comments at 26; MCI WorldCom Lichtenberg/Sivori Decl. at paras. 9-10, 21 (claiming that manual re-entry of pre-ordering information hinders a carrier's ability to reach commercial volumes of orders).

⁴ *BellSouth South Carolina Order*, 13 FCC Rcd at 623.

made by US WEST to ensure both that the problem has been fixed and that no other problem has been created by the change.

MCIW Comment: No explanation from CGT. Language not yet included.

LIDB Testing:

The following functions of LIDB transactions must be included in the AZ test:

1) Actual ordering of LIDB. In every state except Texas to date, LIDB treatment is ordered on the LSR. The LEC then updates the LIDB record. 2) LIDB provides the option to block inbound collect and third party calls as well as PIC changes.

MCIW Comment: Language not yet included.

Testing Hours:

Language must be added to indicate that testing will be performed during normal business hours.

MCIW Comment: Language included with reference to Capacity Testing.

MCIW recommends all functional tests be performed during “normal business hours”.

Billing:

The following language should be incorporated into the MTP. “Data contained in Daily Usage Feeds will be compared to call logs and Telco Bills”. As well, MCIW recommends language such as, “ An audit of these bills will determine the validity of records and if discrepancies are determined, methods for reconciliation require auditing and reporting”.

MCIW Comment: Language not yet included.

UNE-Platform Testing not UNE-C:

The MTP must specify a full production line of UNE-Platform that will be tested. Testing scenarios for UNE-Platform should include the following: new, disconnect, conversion “as is”, conversion “as specified” and conversion with “directory listing change(s) (DL)”. Current scenarios for UNE-C allow for the ability to change/add features and DL. Does this mean that the conversion with changes will occur at the same time or does it mean the conversion will require one order, followed by a supplemental order to process the change(s)?

US WEST has recently agreed that the performance measurements will measure all types of UNE-Platform. Therefore, the types of UNE-P to be measured must be clarified. This is particularly of concern because it is not clear whether US WEST’s definition of UNE-P is the same as that requested by CLECs.

MCIW Additional Comments: This issue is still outstanding. MCIW requests the following questions be answered by US WEST as the answers are critical for determining test scenarios:

For EACH state in the US WEST territory, please provide the following information:

1. Service Delivery Method Available (e.g., UNE-P, resale, loops, EELs, etc.)
2. For UNE-P, by state, provide the following information:
 - Vertical features available (show all features available to retail users and indicate whether they are available for UNE-P)

- Voice mail (is it available for UNE-P conversions, for new?)
 - Branded OS/DA
 - Method(s) of providing OS/DA
3. Is UNE-P available for new as well as conversion?
 4. Define "new." Please be specific.
 5. Define "conversion." For example, a customer with residential service and one feature (CW) wants to migrate to a CLEC. The customer wants to delete the CW and add Caller ID. Is this permissible under a conversion?
 6. Will US WEST allow "migration as is;" "migration as specified"? Define these in US WEST's terms.
 7. Network Design Request: Is this form required for presence in the switch prior to ordering UNE-P? If not, what forms are required?
 8. What USOC's are specific to UNE-P?

Data Collection:

There must be a defined process for data collection, verifying what data collection is to be provided by US WEST, CLECs and the Pseudo-CLEC.

MCIW Comment: No explanation from CGT. Language not yet included.

EDI Pre-Order Functionality:

The version of EDI to be tested must be defined as well as the standards that will be used. EDI pre-order and parsed CSR functionality must be included. If the CSR information is not parsed, the likelihood of errors increases dramatically.

MCIW Comment: No explanation from CGT. Language not yet included.

Maintenance and Repair:

The GUI/IMA must be tested for M&R functionality.

A parity test be performed to distinguish the length of time it takes a CLEC to process an electronic trouble ticket vs. the length of time it takes US WEST. That would be the length of time it takes the order downloads to process to US WEST back end systems.

The “Mechanized Loop Test” (MLT) must be verified. For example, did the MLT result provide the CLEC the proper information to open a trouble ticket?

The US WEST M&R help desk must be tested a variety of days with varied hours of operation tested.

MCIW Comment: No explanation from CGT. Language not yet included.

Unplanned Troubles:

Any recognized “unplanned troubles” that occur during the testing phase must automatically become part of the testing/evaluation process and are not required to follow the rules of section 2.2.3 “Additional Tests”.

MCIW Comment: No explanation from CGT. Language not yet included.

Performance Measurements Comments to the AZ MTP, draft version 3.1

Executive Overview – bottom of page 1:

The document states that “The overall purpose of the collaborative test process ... is to demonstrate ...the extent of operational readiness, performance, and capability of US WEST to provide CLECs with access to OSS for “pre-ordering, ordering, provisioning, repair and maintenance, and billing”. All of these functions must be tested. The list does not include collocation, network performance, interface availability, database updates. There must be details as to how these additional areas

are evaluated. For some OSS processes, results may be evaluated using production data reported on the appropriate performance measure, while for others, actual test scenarios may apply.

CGT Reply: “Network performance and interface availability aren’t currently part of the tests. These aren’t part of the scope bid by CGT and only colocation has been discussed in the TAG discussions to date. Subsequent to the colocation discussions, CGT placed an entire section for colocations in the test standards document changes made where appropriate”.

MCIW REPLY: The availability of interfaces must be evaluated as part of the OSS test since it is the interfaces that provide the access to the OSS that are being tested. Without evaluating the availability of the interfaces, conclusions cannot be made about the level of access the CLECs have. MCIW believes it would worthwhile to review and evaluate production results for the network performance as this is also considered an OSS, although MCIW does not expect the network to be specifically tested.

Executive Overview - Retail Parity Evaluation :

It is not clear to MCIW why this is identified as a separate aspect of the test, with its own activities. An evaluation of parity or of US WEST compliance with pre-defined benchmarks cuts across the entire test. Moreover, MCIW reads this section as if the test is only concerned with the actual systems that CLECs and US WEST use. This section also assumes there is inherent parity in the interfaces and systems that CLECs use compared to those used by US WEST. For pre-order response time, for example, parties know that the OSS access that CLECs have is not identical to the

access US WEST retail representatives have, and therefore it may not be able to be evaluated using a parity standard. MCIW recommends language to address such issues.

CGT Reply: "This is already a pretty clear high level explanation of what the retail parity evaluation is to accomplish. Extensive details as to exact questions the evaluation will address and how the testing and evaluations will be conducted are in the test standards document. CGT wants this retail parity evaluation to be a high quality evaluation with a clear indication as to whether parity exists in between the service order preparation and entry tools for resale and retail. CGT would welcome your detailed comments on ways we might improve the retail parity test described in the test standards document. No change made here."

MCIW REPLY: MCIW's reviewed the first draft of the TSD and does not believe that the parity evaluation will be effective as currently described. It is not clear why this separate section of the test is necessary when an evaluation of parity/compliance with benchmarks cuts across the core of the entire test. Additionally, as described in the TSD, this is a qualitative evaluation rather than a quantitative one, though performance measurements exist to capture quantitative results for this part of the test. In order to improve this part of the test, the test administrator should collect and evaluate data using the performance measurements to the extent they address the process, rather than merely observe the process and the activities. In addition, CGT response that the details are addressed in the Test Standards Document does not answer the concern. As stated above, an updated copy

of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Executive Overview - Performance Measurement Evaluation - page 2:

The MTP states that “the assessment will include reviews of Performance Measurement data collection and analysis (including an evaluation of the processes and procedures that US WEST employs to collect data and calculate performance measurements), a performance evaluation over a three-month period specified by the ACC, Functionality and Capacity tests and PM verification.”

MCIW believes that the MTP may be mixing two activities that need to be performed separately and at different times. The test cannot both use the performance measurements to collect and evaluate test results and test the performance measurements themselves to ensure they are performing adequately. MCIW believes there are no systems controls with this type of approach. For example, what tool will the test administrator use to evaluate the performance measurements themselves? MCIW knows of no mention of an independent tool to evaluate them. Also, assuming the test administrator were determined a problem with one or more of the measures, it would invalidate that portion of the test, as the evaluation tool (the performance measure) would have to be fixed and re-certified and then the test results would be properly reported. MCIW is also concerned that the test generator or test administrator is being asked to add the assessment of the performance measurements to their already formidable scope of work. Based on MCIW’s experience in California, MCIW strongly recommends the use of a professional accounting/consulting firm. In California, Price Waterhouse Coopers

was retained to conduct an audit of Pacific Bell's performance measurements and underlying systems. Similarly, Deloitte Touche has been engaged to conduct an audit of GTE's performance measurements and systems. As Price Waterhouse Coopers has just completed its audit, MCIW would be pleased to make available to the Arizona Commission, and other parties, any information that it is permissible to share about the engagement, including the detailed scope of the audit. MCIW believes the type of audit that is necessary should be completed before the actual testing is started. In this way, the performance measurement systems and calculations can be independently verified before they are used to evaluate the output from the test.

CGT Reply: 'This does not need to be part of the master test plan document. CGT will perform an evaluation of the US WEST processes for collecting and computing performance measures. This will not be a full scale audit but an examination and report as to whether processes exist, whether these processes are sufficient to ensure quality, incident work orders where changes to the processes are deemed necessary, and an indication as to whether sufficient conformance and quality exist to initiate testing. No changes made.'

MCIW REPLY: MCIW still believes that a full scale audit, rather than a recalculation of the benchmark and critical value results is necessary before the data can be used to ascertain US WEST's 271 readiness. To truly determine if US WEST's performance measures are ready to be used to evaluate the results of the OSS test, an audit must be conducted to ensure US WEST has adequately implemented the agreed to measures and has proper controls around the collection, production and storage of the data. In addition, the underlying systems must be

audited to ensure that the OSS activity being reported properly reflected in the data that is extracted from the system. MCIW's concern is further exacerbated by the fact that US WEST has not had any performance measurement in production leading up to the test. It is only now implementing some of its measures, while others may come on-line during, or even after, the test. Because of confidentiality issues that are still not resolved, CLECs have not had an opportunity to review any of US WEST's performance measurement results. MCIW's position is supported by the findings of the Department of Justice (DOJ) in its evaluation of the SBC - Texas 271 application. In it, the DOJ determined that one of the reasons the application should be denied was that it found "the performance measurement review" completed by Telcordia was insufficient. In its finding, the DOJ stated that, "(I)n evaluating the actual commercial experience of SBC's competitors, the Department and the Commission place great weight on the reported performance data; the reliability of the reported data is critical."

Executive Overview - last paragraph - page 3:

The MTP states that "US WEST will also provide personnel to develop and execute cases on the retail side of the Retail Parity Test." MCIW opposes this as it permits US WEST to control an important part of the test and may violate blindness. MCIW recommends utilizing production data instead.

CGT Reply: "These tests will be conducted under the close direction of the third party consultant and will be conducted using tightly controlled test scripts. Blindness will be maintained by conducting the tests in an area segregated from other US WEST employees. No change made"

MCIW REPLY: Even with the best efforts and intentions it is unclear how blindness can be maintained for this segment of the test. Even if a separate US WEST office is used to conduct this part of the test, if the employees that are being observed still are US WEST employees, they have a motivation to perform well during the test. In addition, if they are placing orders for US WEST customers, and they know they are being observed, their performance level is likely to be affected.

Section 2 Introduction - 2.2 Overall Approach

With regard to the 14 state region testing. MCIW believes that this issue was closed and recommends the resolution be reflected.

CGT Reply: "Needs further TAG discussion"

MCIW Reply: Will await discussion

Section 3 - Scope 3.3.2 - Retail Parity Evaluation

MCIW would like more details on what this aspect of the test involves and how it fits into the scope of the overall test. In addition, MCIW would like more clarification on what is meant by the words "reasonably equivalent".

CGT Reply: "Details for how the test will be conducted can be found in the 271 Test Standards Document. That document is a specification for how the tests will be conducted. The MTP is more general. No changes made"

MCIW REPLY: Per CGT's statement, "The Master Test Plan is a map for how the Arizona tests will be conducted", therefore, to comment that "the MTP is more general" doesn't make sense. Also, as stated above, an updated copy of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Section 3 - Scope 3.3.5 - Performance Measurement Evaluation

The first sentence states that the “Performance Measurements Evaluation is a statistically valid assessment of the performance measures...” MCIW questions whether it is really that the performance measurements evaluation is a statistically valid assessment of the test output using the performance measures. In addition, MCIW’s would like to again recommend the use of an outside auditor that would perform an in-depth evaluation of the performance measures due to the enormous undertaking of this area of the test.

CGT Reply: “Changes made to reflect that this is an evaluation of the US WEST processes for performance measures and not an evaluation of the performance measures themselves. The three bullets which follow clearly define what is included. An evaluation of the performance measures themselves is not included.”

MCIW REPLY: MCIW does not believe that just because the scope of the RFP for this test did not include a comprehensive audit of the performance measures that one does not need to be completed. Similarly, MCIW does not believe that just because Cap Gemini did not include an audit in the scope of its response to the RFP for the OSS Test does not mean one is not required. MCIW has consistently requested a validated audit of the Performance Measures prior to the start of test. As was noted in the DOJ Evaluation of SBC's 271 application, the DOJ took serious issue with Telcordia for not examining whether the metrics were meaningful and found their reviews did not assure accuracy nor reliability of the performance data. Therefore, MCIW reinforces its request for a complete and thorough audit of the

performance measurements. Only through a complete audit will the reliability of these performance measures be assured.

Section 3, - Scope 3.4 - Product Types

MCIW requests more detailed descriptions of system generated “acknowledgement” and “firm order confirmation” (FOC) notifications. Specifically MCIW would like to know the difference between the two. At this time, there is no performance measurement that looks at “acknowledgement” notifications.

CGT Reply: “Since this is test case level detail, CGT feels that this is best addressed in the test standards document. No changes made.”

MCIW Reply: While US WEST has agreed to add a note to the PO-5 PID, MCIW believes it is critical that US WEST’s use of acknowledgements and FOCs be evaluated during the test to ensure US WEST is not substituting acknowledgements for FOCs, and is not re-FOCing an LSR and in the process invalidating the original FOC and the associated due date.

Section 4 - Functionality Test Purpose - 4.1

New Language added: “In some cases, ASR test scenarios (entered into the US WEST EXACT System) may need to be executed by volunteer CLECs.”

MCIW REPLY: Given that the EXACT system will be used during the test, it is important that results for it be included in the relevant performance measures.

Section 4 - Functionality Test - 4.3.1 Pre-Ordering/Ordering

MCIW recommends the inclusion of “loop qualification” and “reject/failed inquiries” in the pre-ordering/ordering functionalities.

CGT Reply: “Done”

MCIW REPLY: MCIW does not see where “reject/failed inquiries” has been added. In addition, Dean Buhler of US WEST and the CLECs have reached agreement that although the reject/failed inquiries will not be reported on a performance measurement during the test, results for them will be captured and reported separate from the PO-1 measure, and subsequently evaluated. After the test, a decision will be made as to whether they should be reported on the measure. In addition, MCIW notes that there are several agreements like this where although results will not be reported on the measures they will be captured and evaluated as part of the test. MCIW would like to see a list of these included in the next MTP version to ensure CGT has included them all, and during which part of the test they will be captured.

Section 4 - Functionality Test – 4.6 & 4.7.4.1

MCIW recommends the purpose and use of the “Root Cause Analyses of all issues” be defined and agreed to by all parties.

CGT Reply: “Documented in test standards document under incident work order process”

MCIW REPLY: As stated above, an updated copy of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Section 4 - Functionality Test - 4.7.3.2 Test Execution Entrance Criteria

MCIW strongly recommends that the AZ MTP account for performance measures as an entrance criteria of the test. MCIW cannot stress enough, from experience, the need for explicit identification of performance measurements as an

entrance criteria to the test execution. MCIW also requests that the “operational readiness” and the “verification that all requirements have been met” and for the required performance measurements to be included as a criteria in the Arizona MTP. MCIW experience with other ILECs proved that not only is the implementation of the performance measurements a significant undertaking, but also that the verification process is essential. This experience has shown that where the operational assessment (audit) has been done, deficiencies were identified within the performance measurements processes that required corrective action before the measures could be declared fully functional. In the overall development of the planning and execution of the OSS test, MCIW recommends consideration should be given for the interval to validate the operational readiness of the performance measures and to correct any deficiencies.

CGT Reply: “Done”.

MCIW REPLY: Though MCIW appreciates these changes, MCIW would like to reiterate that it believes that a complete audit is also a requirement as an entrance criteria.

Section 5 - Retail Parity Evaluation - 5.2, Retail Parity Evaluation Scope - & Section 5 - Retail Parity Evaluation - 5.5, Retail Parity Evaluation Data

MCIW request that the criteria for the evaluation that will be made with respect to this part of the test be defined. This is especially necessary for the aspect of this evaluation that will look at “the experience which the customer has while on the line with a CLEC representative, in comparison to the experience of a customer while on the line with a US WEST representative.”

The statement that “Data must originate from both resale CLECs and from US WEST retail” implies that all of this part of the test is focused solely on resale. MCIW strongly opposes this and asks that it be changed to reflect the CLEC marketplace.

CGT COMMENT: “The details as to what criteria for evaluation will be used will be specified in the 271 Test Standards Document. No change made here”

MCIW REPLY: As stated above, an updated copy of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Section 5 - Retail Parity Evaluation - 5.8, Retail Parity Evaluation Success Criteria

The statement that, “Do the OSS respond within substantially the same time frames” implies that this will be measured at parity, but MCIW believes that due to concerns about the use of EnView type process, it is still an open issue whether a parity comparison can be performed.

CGT Reply: “How this is accomplished is part of the test standards document and doesn’t need to be detailed here. No change made.”

MCIW REPLY: MCIW is concerned with whether or not an EnView type process can be used for this part of the test, as well as for the maintenance transaction portion. US WEST has been asked to provide details on how this process will work. As well, US WEST has agreed that it bears the burden should the test commence using an EnView type process and problems develop. MCIW suggests that this be documented in the MTP and TSD. Also, MCIW was referred to the TSD for details.

As stated above, an updated copy of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Section 6 - Capacity Test Purpose - 6.3, Capacity Test Coverage and Scenarios

MCIW would like clarification for the use of a footnote with reference to Appointment Scheduling?

CGT Reply: "Due date interval????"

MCIW REPLY: To clarify this concerns, MCIW was referring to the footnote that says "if technically feasible." MCIW would like clarification as to what this means with respect to Appointment Scheduling.

Section 8 - Performance Measurement Evaluation - 8.3 and 8.3.1 Performance Measurement Evaluation Coverage and Scenarios

Both sections reference processes and procedures "in place". MCIW requests clarification of what "in place" means.

CGT Reply: This means in operation at the time the performance measurement evaluation takes place. No change made"

MCIW REPLY: MCIW would like to clarify that its our expectation that all of the performance measures that will be used in the test would have to be operational before the performance measure evaluation takes place and before the test begins. Alternatively, US WEST bears the burden to demonstrate how any part of the test can commence without a particular measure being in place. Currently this language is not included in either the MTP or TSD, however, MCIW recommends the inclusion.

Section 8 - Performance Measurement Evaluation - 8.3 Performance Measurement Evaluation Coverage and Scenarios

This section states that three months of data will be evaluated. If test data cannot be used, MCIW would like to emphasize how critical it is for US WEST to implement the measures as soon as possible so that when it comes time to audit, production data can be utilized. As a reference, this activity in other states (e.g., California) took over two months to complete utilizing a staff of over fifteen full-time analysts. MCIW recommend that these activities be added to the project timeline.

CGT Reply: “The CGT historical data evaluation activities are all ready part of the project time line. No change made”

MCIW REPLY: Although CAP Gemini agreed to include the performance measure evaluation as an entrance criteria for the functionality test, MCIW does not see it listed in Section 10, “Proposed Schedule and Timeline”. More importantly, MCIW does not see how Cap Gemini can accomplish the performance measure evaluation in the time it has allotted itself. Additionally, a number of critical measures are still under development and would be available for evaluation, let alone three months of data.

Section 8 - Performance Measurement Evaluation - 8.4.1 Review of Data Collection Process

The MTP states that, “if appropriate, the Test Administrator will conduct interviews of US WEST and/or CLEC personnel.” In the recent audit of Pacific Bell’s performance measurements, CLECs were informed that Price Waterhouse Coopers conducted hundreds of interviews and meetings with the Pacific Bell

personnel who work on the performance measurements. In addition, the auditor reviewed all relevant procedures as well as evaluated numerous systems used in the reporting process, including source data systems. Therefore, MCIW simply requests that Cap Gemini take these types of processes into account.

CGT COMMENT: “CGT did not bid a full audit of the performance measures. We bid a review as stated in the MTP. No change made”

MCIW REPLY: Recommends this issue be escalated to the ACC.

Section 8 - Performance Measurement Evaluation, 8.4.2 Historical Data Evaluation

MCIW recommends that historical data be defined. MCIW does not agree that recalculating three months of raw data can be called an evaluation of US WEST’s performance measurements.

CGT Reply: “Historical data is the raw data and computed data for the period of time. No change made”

MCIW REPLY: MCIW requested clarification that the term “historical data” be defined as “three consecutive months of data, and not any three months of data US WEST provides”. The goal is to determine if the data is stable, consistent and meets other generally accepted auditing requirements.

Section 8 - Performance Measurement Evaluation - 8.5 Performance Measurement Evaluation Entrance and Exit Criteria

MCIW recommends more that a review of US WEST’s documented processes and procedures. The audit should reveal that the procedures match the agreed to performance measurements, that the data collected is compliant with the definitions

of each measure, (this includes a review of the underlying OSS from which the source data is gathered), and that any calculations performed are as described.

Furthermore, MCIW recommends that section 8.5 reference what happens if there is material that is non-compliant in any one of these areas.

CGT Reply: “No change here. However, CGT’s scope includes a review. An audit is outside the scope of our work. No change made”

MCIW Reply: Recommends this issue be escalated to the ACC.

MCIW Comments on specified sections in the AZ MTP, draft version 3.0:

Section 2.1 – Purpose - 2nd bullet, MCIW would like defined the entrance and exit criteria to be used to determine operational readiness. Is the "foreseeable demand" based on CLEC forecast?

CGT Reply: “No change made. Details are in the test standards document.”

MCIW REPLY: As stated above, an updated copy of the TSD was not attached. Until such time as a review of an updated copy of the TSD is received, MCIW reserves further comment on this issue.

Section 3.1.2 - Billing Architectures - MCIW recommends that since the ASR interface is being evaluated, the associated Carrier Access Billing System (CABS) bills ought to also be included in the list of billing interface files to be evaluated.

CGT Reply: “Needs TAG approval. No change made”

MCIW Reply: Will await TAG approval.

Section 4.2.1 - Pre-Order/Order/Provisioning Interfaces – MCIW would like defined what LSOG version will be tested.

CGT Reply: “LSOG Version will be entered on next draft”

MCIW REPLY: Open issue until version is defined.

Section 4.3 - Functionality Test Coverage and Scenarios – 2nd paragraph, MCIW requests that partial flow-through service orders be defined.

CGT Reply: “With the US WEST requested change, the definition of partial flow-through service orders should be clear. No further change required.”

MCIW REPLY: The US WEST Requested change only refers to “Complete flow-through orders”. MCIW requests that partial flow-through service order be defined.

Section 4.3.1 - Pre-Ordering/Ordering - MCIW requests that the following pre-order processes be included in the functionality test: Service Order Status, Directory Listing, Installation status.

CGT Reply: “Done”

MCIW REPLY: MCIW does not see the reflected change.

Section 4.9 - Functional Test Assumptions - last bullet. MCIW recommends the use of three billing cycles in order to accurately validate initial, prorates, disconnects, migrations, adjustments, etc.

CGT Reply: “This issue was discussed by the TAG and it was determined that two billing cycles will be used for the tests. No change made.”

MCIW REPLY: MCIW firmly believes it will take three billing cycles to fully evaluate the US WEST’s billing functionality. For example, if an error shows up on a bill in January and the correction misses the February cycle date, the March bill

needs to be reviewed to be sure the fix made it onto it. Thus, the emphasis to test three billing cycles.

General Comments regarding Performance Measurements

1) The functionality test and the capacity test lack proper entrance criteria. The implementation and certification of the performance measurements must occur before the OSS test can be executed. In addition, although Cap Gemini recognizes that the statistical methodology must be agreed to in order to evaluate the test results provided by the performance measurements, the establishment of a critical value and other statistical tools must be included as an entrance criteria for the overall test planning phase of the test. This is so since the number of test cases is driven by the critical value and confidence level that is selected.

Based on version 4.4 of the PID provided by US WEST and dated February 1 2000, PO-2A, PO-2B, OP-3 by UNE loop type, OP-4 by UNE loop type, OP-6 by UNE loop type, MR-3 by UNE-loop type, MR-4 by UNE loop type, MR-5 by UNE loop type, MR-6 by UNE loop type, MR-7 by UNE loop type, MR-8 by UNE loop type, MR-9 by UNE loop type, and NP-1 will not be available to capture results until January 2000, which means results will not be reported to parties until March 1, 2000.

PO-5A and BI-1 by product will not be available to capture results until February 2000, which means results will be reported until April 1, 2000.

PO-3C, PO-4C, and OP-3, OP-6, MR-3, MR-4, MR-5, MR-6, MR-7, MR-8, MR-9 for retail comparison, will not be available to capture results until March 2000, which means results will be reported until May 1, 2000.

PO-1 (loop qualification), PO-3B and PO-4B will not be available to capture results until April 2000, which means results will be reported until June 1, 2000.

PO-5B, PO-5C, PO-5D, PO-8, PO-9, OP-8 and OP-13 will not be available to capture results until June 2000, which means results will be reported until August 1, 2000.

BI-2, BI-3, BI-4, DB-1 and DB-2 will not be available to capture results until 2nd Quarter 2000, which means results may be reported until August 1, 2000.

2) The "historical evaluation" (i.e., audit) of the performance measurements is extremely simplistic and will not accomplish the necessary goal. The evaluation will merely be a review of reporting procedures and a recalculation of the z statistic or benchmark results using historical raw data. The results of this evaluation will be compared to the results US WEST produced in the performance measurement reports. A true audit needs to review the systems output that are the source data for the measurements, the controls around the extraction and production of the performance measurements, the documentation and coding that are used to produce the performance measurements, the mechanized and manual processes used to produce the reports, and other critical areas. Furthermore, the "historical evaluation" assumes there will three months of production performance measures to be used for recalculation. Currently some of the performance measurements will not be implemented until 2nd Q 2000. Lastly, the approach identified by Cap Gemini is to perform the audit while the test is occurring. This violates basic systems and audit controls, and would likely result in no constant or baseline.

3) It is not clear why this is a separate section of the test when an evaluation of parity/compliance with benchmarks cuts across the core of the entire test. For example, while the provisioning process is part of the retail parity evaluation, it is not one of the processes for which a comparison will be performed. Thus, it would seem that this part of the test focuses on the access CLECs have to the OSS on behalf of their customers, rather than parity of the overall processes and systems for the CLECs. In addition, it is basically a qualitative evaluation, which is necessarily subjective. At the very least, it is recommended that the performance measurement results be employed as the criteria for success in this test.

4) Cap Gemini would allow US WEST to provide personnel to develop and execute test cases on the retail side of the "Retail Parity Test". This would allow US WEST to control an important part of the test and would likely compromise any blindness that existed. MCIW does not understand why production data will not suffice for the retail portion of the Retail parity test.

Questions/Changes to the Cap Gemini 271 Standards

Section 1.3 – Last paragraph “Pseudo-CLEC will enter data into the ILEC OSS. MCIW reads this to mean the “Pseudo-CLEC” will access directly into US WEST’s systems. MCIW recommends additional language that would reference what technology will be used to enable transactions to be submitted to US WEST.

MCIW Comment: Awaiting reply.

Section 1.4 – Second paragraph – List of information to be collected. MCIW recommends the collection of billing records.

MCIW Reply: No explanation from CGT. Language not yet included.

Section 2 – “Friendlies” – MCIW requests language to support the difference between a "friendly" and an end user. In the third party test with PacBell, a "friendly" was defined as an address to hook up service to the network interface device. While an end user was defined as one who will make all of the usage calls.

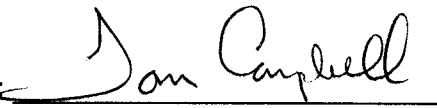
MCIW Reply: No explanation from CGT. Language not yet included.

Section 3.4 – Functionality Test Coverage and Scenarios – Second paragraph states “The Functional Test will include Flow through, non-flow through, and manual orders.” The second sentence proceeds to describe flow through vs. non-flow through. MCIW recommends a definition for those orders that will be “manual”.

MCIW Comment: Awaiting reply

Dated: February 29, 2000

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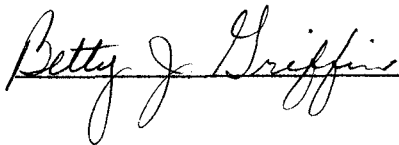
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